

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF RHODE ISLAND (Providence)

In Re:  
Judith A. Ferry

Case Number 1:17-bk-11782  
Chapter 7

**MOTION FOR TERMINATION OF LOSS MITIGATION PERIOD**

Now comes Deutsche Bank National Trust Company, as Trustee for Morgan Stanley Dean Witter Capital I Inc. Trust 2002-AM2 Mortgage Pass-Through Certificates, Series 2002-AM2 ("Deutsche Bank") and respectfully moves this Court to terminate the loss mitigation period. In support thereof, Deutsche Bank states as follows:

1. On November 28, 2017, the Court entered an order granting the Debtor's Loss Mitigation Request.
2. The Debtor was reviewed for a loan modification and a denial letter dated February 20, 2018 was issued. A copy of the denial letter is attached hereto as Exhibit A.
3. The Debtor was denied for a modification because the mortgage account was greater than ninety days delinquent and that the account had previously been modified the maximum amount of times allowed by the investor. The investor only permits one modification and a prior modification was granted in August 2007. The Debtor's account is over ten years in arrears as only a few payments were made on the 2007 modification.
4. Accordingly, Deutsche Bank moves for termination of the loss mitigation period.
5. A hearing on the status of loss mitigation is pending for March 7, 2018. In light of this motion, Deutsche Bank requests that the status hearing be cancelled and a hearing scheduled on this Motion.
6. **Within fourteen (14) days after service, if served electronically, as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if served by mail or other excepted means specified, any party against whom such paper has been served, or any other party who objects to the relief sought, shall serve and file an objection or other appropriate response to said paper with the Bankruptcy Court Clerk's Office, 380 Westminster Street, 6th Floor, Providence, RI**

Diane Finkle

03/20/2018 NO OBJECTION HAVING BEEN FILED, AND LOAN MODIFICATION HAVING BEEN DENIED, MOTION IS GRANTED AND LOSS MITIGATION IS TERMINATED

**02903, (401) 626-3100. If no objection or other response is timely filed, the paper will be deemed unopposed and will be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise.**

WHEREFORE, Deutsche Bank requests that the loss mitigation period be terminated. A status hearing is pending for March 7, 2018. In the interests of justice, Deutsche requests that the status hearing be cancelled and a hearing scheduled on this Motion, should an objection be filed.

Dated: February 28, 2018

Respectfully Submitted,  
Deutsche Bank National Trust Company, as  
Trustee for Morgan Stanley Dean Witter  
Capital I Inc. Trust 2002-AM2 Mortgage  
Pass-Through Certificates, Series 2002-  
AM2,  
By its attorney,

/s/ Catherine V. Eastwood  
Catherine V. Eastwood, Esq.  
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**CERTIFICATE OF SERVICE**

I, Catherine V. Eastwood, Attorney for **Deutsche Bank National Trust Company, as Trustee for Morgan Stanley Dean Witter Capital I Inc. Trust 2002-AM2 Mortgage Pass-Through Certificates, Series 2002-AM2** hereby certify that on February 28, 2018 I electronically filed the foregoing *Motion for Termination of Loss Mitigation Period* with the United States Bankruptcy Court for the District of RI using the CM/ECF System. I served the forgoing documents on the following CM/ECF participants:

Gary L. Donahue, Assistant U.S. Trustee  
Lisa A. Geremia, Trustee  
Russell D. Raskin, Esquire

I certify that I have mailed by first class mail, postage prepaid the documents electronically filed with the Court on the following non-CM/ECF participants:

Judith A. Ferry  
28 Fulton Street  
Warwick, RI 02889

/s/ Catherine V. Eastwood  
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